

REMARKS

Favorable reconsideration of this application as presently amended and in light of the following discussion is respectfully requested.

Claims 1, 3-11, 13-28, 30-36, and 41-48 are presently active in this case. Claims 41-48 have been added by way of the present Amendment. No new matter has been entered. (See, e.g., paragraphs [0020] and [0024] of the original specification.) The Applicant requests entry of the amendments.

In the outstanding Official Action, Claims 1, 9, 11, 14, 28, 30, 33, and 35 were rejected under 35 U.S.C. 102(e) as being anticipated by Denman et al. (U.S. Patent No. 6,745,240). Claims 3-8, 10, 13, 15-27, 31, 32, 34, and 36 were rejected under 35 U.S.C. 103(a) as being unpatentable over Denman et al. in view of Hoyer et al. (U.S. Patent No. 6,381,635). For the reasons discussed below, the Applicant traverses the above rejections.

The Applicant notes that a claim is anticipated only if each and every element as set forth in the claims is found, either expressly or inherently described, in a single prior art reference. As will be demonstrated below, the Denman et al. reference clearly does not meet each and every limitation of independent Claims 1, 11, 21, and 28.

Claim 1 of the present application advantageously recites a peripheral device comprising, among other features, means provided in the peripheral device for selecting a managing peripheral device to manage a plurality of other peripheral devices and the peripheral device, wherein the managing peripheral device is selected by the means for selecting out of a group including the plurality of other peripheral devices and the peripheral

device. Claim 11 recites a system comprising, among other features, means provided in each peripheral device for selecting a managing peripheral device to manage the plurality of peripheral devices, wherein the managing peripheral device is selected by the means for selecting out of a group including the plurality of peripheral devices, which includes peripheral devices other than the peripheral device selecting the managing peripheral device. Claim 21 recites a method comprising, among other steps, the step of using a peripheral device of the plurality of peripheral devices to select a managing peripheral device to manage the plurality of peripheral devices, wherein the managing peripheral device is selected out of a group including the plurality of peripheral devices, which includes peripheral devices other than the peripheral device used to select the managing peripheral device. And Claim 28 recites a computer program product comprising, among other features, a second computer code device configured to select the managing peripheral device to manage the plurality of peripheral devices, wherein the managing peripheral device is selected out of a group including the plurality of peripheral devices, which includes peripheral devices other than the peripheral device used to select the managing peripheral device. The Applicant submits that the above features are not disclosed in the Denman et al. reference.

The Official Action indicates that the various nodes (106) discussed in the Denman et al. reference are being cited for the teaching of the peripheral device of the present invention.

The Denman et al. reference describes a method and system for configuring a massively parallel processing system. (Col. 1, lines 28-30.) The Denman et al. reference indicates that parallel processing is considered an advantageous approach for increasing

processing speeds in computer systems, and that parallel processing can provide powerful communications and computer systems which can handle complex problems and manipulate large databases quickly and reliably. (Col. 1, lines 32-37.) The Denman et al. reference thus describes an invention that uses a voting process to logically configure the parallel processing system, where each node in the system votes for a node that it believes is the best candidate to control the configuration process, and the controlling node, also called a coordinator, selects the configuration and distributes the information to all other nodes in the system. (Col. 2, lines 1-6.)

The Denman et al. reference depicts in FIG. 2B an exemplary node (106) of the invention, and describes the node (106) as including a computer (250) having a processor (252) and a memory (260), such as random access memory (RAM). (Col. 4, lines 39-43.) The Denman et al. reference notes that the computer (250) may be operatively coupled to a display, and may be coupled to other devices, such as a keyboard, a mouse device, a printer, etc. Col. 4, lines 43-47.) The Denman et al. reference states that “[o]f course, those skilled in the art will recognize that any combination of the above components, or any number of different components, peripherals, and other devices, may be used with the computer 250.” (Col. 4, lines 47-51.)

While the Denman et al. reference mentions that peripherals, such as a printer, can be coupled to the computer (250), it is evident from the discussion throughout the Denman et al. reference that the node (106) is the computer (250) having a processor (252) and a memory (260), and that the computer (250) is configured to perform the functions of the node. The

peripherals mentioned as being optionally connected to the computer (250) are not the node described in the Denman et al. reference and are not configured to perform the functions of the node. Thus, the Denman et al. reference does not disclose a peripheral device having the features recited in the claims of the present application.

The Applicant submits that the computer (250) of the Denman et al. reference **is clearly not a “peripheral device”** as that term is used by those of ordinary skill in the art. The computer (250) depicted in FIG. 2B of the Denman et al. reference is clearly not considered a peripheral device. The Denman et al. reference is directed to a method and system for configuring a massively parallel processing system (col. 1, lines 29-30), which can utilize numerous processors and compilers of computer systems, such as that depicted in FIG. 2B, to increase processing speeds, handle complex problems, and manipulate large databases col. 1, lines 32-37). Clearly, the Denman et al. reference is not directed to the control or operation of various peripheral devices, and never discloses that the peripherals mentioned in column 4 have the features recited in the claims of the present application.

Accordingly, the Applicant submits that independent Claims 1, 11, 21, and 28 are not anticipated by the Denman et al. reference, as this reference does not disclose all of the limitations recited in the independent claims. Thus, the Applicant respectfully requests the withdrawal of the anticipation rejections of independent Claims 1, 11, 21, and 28.

The dependent claims are considered allowable for the reasons advanced for the independent claims from which they respectively depend. These claims are further considered allowable as they recite other features of the invention that are neither disclosed

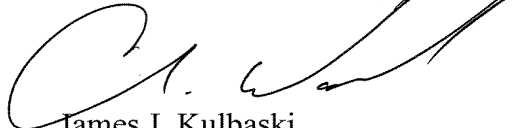
Application Serial No.: 09/922,837
Reply to Office Action dated July 12, 2007

nor suggested by the applied references when those features are considered within the context of their respective independent claim.

Consequently, in view of the above discussion, it is respectfully submitted that the present application is in condition for formal allowance and an early and favorable reconsideration of this application is therefore requested.

Respectfully Submitted,

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